

A-E CONTRACTING BULLETIN 96-05, 4 SEP 96

SUBJECT: SUBCONTRACTING PLANS AND REPORTS

1. Have you ever seen a SF 294 or SF 295?
2. These forms are prepared and submitted by contractors to report on their compliance with the goals in their Small, Small Disadvantaged and Women-Owned Small Business Subcontracting Plan. A subcontracting plan is required for any negotiated contract over \$500,000 (\$1,000,00 for construction) with a large business where there are subcontracting possibilities. See FAR 19.702, 19.704, and 19.705-2. The subcontracting plan is incorporated into the contract as a material requirement.
3. The forms are cited in paragraph (d)(10) of FAR Clause 52.219-9, which must be used in any contract which requires a subcontracting plan. A contractor submits a SF 294, Subcontracting Report for Individual Contracts, for each active contract, and a SF 295, Summary Subcontract Report, covering all active contracts with USACE. The reports must be submitted to the contracting officer semi-annually on 30 April and 31 October.
4. Subcontracting plan requirements must be cited in the CBD announcement for any A-E contract over \$500,000. Preparation and negotiation of the subcontracting plan, if required, must begin early in the negotiations to avoid any delay in contract award. The technical manager and/or contract specialist should discuss the SF 294/295 reporting requirements with the firm during negotiations and ensure that the reports are submitted in a timely manner throughout the performance of the contract. Negative reports (such as an IDC with no orders issued yet) are still required. There are several remedies available if the contractor does not comply with the subcontracting clauses and plan.
5. This bulletin was coordinated with the HQUSACE Small Business Office. See your local Deputy for Small Business (formerly SADBUs Specialist) for more.

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